


**METROPOLITAN  
POLICE**
**TOTAL POLICING**

## Community Impact Assessment

<b>Freedom of Information Act Document</b>	
<b>Protective Marking</b>	Official
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<b>Title</b>	Op Face MPS Live Facial Recognition
<b>Summary</b>	Overarching Community Impact Assessment for Deployment of MPS LFR Technology.
<b>Branch / OCU</b>	NE CU
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### Initial Community Impact Assessment

## **Information**

On Tuesday 11<sup>th</sup> February 2020, Operation FACE will take place in Stratford, Newham BCU. This is an Operation aimed at reducing, preventing and detecting violent crime by apprehending offenders engaged in and wanted for violent crime and precursor offences. The operation will comprise of a high visibility policing presence together with the support and deployment of Live Facial Recognition (LFR) technology, the first live deployment in London.

This Operation will take place on a single day deployment at an identified crime hotspot on NE BCU. [REDACTED]

This centres on Stratford Shopping Centre and the approach to the major transport hub at Stratford. The precise location of the deployment, utilising the technology available, will be identified to ensure best use of resources and equipment.

This will be the first live deployment of Live Facial Recognition within the Metropolitan Police Service and its use as a tactic within a violent crime prevention and detection operation. The technology and its use has already attracted attention from the media and also protest groups who see it as a means of interfering with privacy.

This Tactical Plan will focus on the violent crime reduction, prevention and detection aspects of this operation. [REDACTED]

## **Purpose**

This is an initial assessment for the routine Deployment of LFR within the MPS. This form is an overarching assessment of the potential community impact, on residents of Newham of overtly deploying LFR as a policing tactic.

## **Methodology**

This assessment follows the [REDACTED] model of community assessment.

An assessment of intelligence (both open source and closed) and Environmental scanning together, where appropriate, with consultation with community members has been carried out (but see caveats for a definitive list).

The results of this process are combined to provide a community impact assessment which is divided into three sections:

Experienced (how do communities feel)

Evidenced (what does our information tell us is happening)

Potential (what might happen)

The results of each of these sections are tabulated to give a numerical assessment of community tension, where 1 is the highest and 6 is assessed as normal. The actual assessment figure is highlighted in each table.

## **Caveats**

This assessment is based on a 'snapshot in time', where appropriate the views of those consulted and the experience of those making the assessment. Any significant change in circumstances or events must necessarily trigger a new assessment reflecting those changed circumstances.

### **Information Commissioner's report**

There is strong public support for the use of LFR for law enforcement purposes:

- 82% of those surveyed indicated that it was acceptable for the police to use LFR;
- 72% of those surveyed agreed or strongly agreed that LFR should be used on a permanent basis in areas of high crime;
- 65% of those surveyed agreed or strongly agreed that LFR is a necessary security measure to prevent low-level crime; and
- 60% of those surveyed agreed or strongly agreed that it is acceptable to process the faces of everyone in a crowd even if the purpose is to find a single person of interest.

The public's support holds up even if they were to be stopped by the police as a result of LFR matching them (erroneously) to a subject of interest. 58% of those surveyed thought it was acceptable to be stopped by the police in such circumstances, while 30% thought it was unacceptable.

### **London Policing Ethics Panel**

- 57% police use of LFR is acceptable
- Increase to 83% acceptance for LFR to search for serious offenders
- 50% feel the technology would make them feel safer
- However, approximately 1/3 raised concerns about the impact on their privacy

To seek to further address concerns, the MPS has proactively engaged with Civil Liberties interest groups. Additionally the MPS facilitated independent academic research and engaged the London Policing Ethics Panel (LPEP) and the London Mayor's Office (City Hall) for additional guidance.

A Stakeholder engagement strategy has been developed and interlaced with Press and Media and Risk Management strategies.

The London representatives for the LGBT IAG and the Race IAG were both consulted in October 2019

The MPS has listened carefully to the many parties with interest in the use of LFR and has carefully considered safeguards to help support the use of LFR. Therefore, LFR Deployments must be carefully designed with very clear objectives, in keeping with LPEP recommendations, having regard to a comprehensive assessment of the rights of everyone whose images may be captured by the LFR system and the safeguards necessary to protect them.

## **Legislative Assessment**

There is a clear legal basis for the interference with qualified rights, which the public can understand, and the action/interference seeks to achieve a legitimate aim. For further details see the LFR Legal Mandate.

## I. Experience (how do communities feel)

### Assessment definitions

1	Imminent	Corroborated evidence of preparation for crime and disorder – e.g. groups gathering, weapons being prepared etc. Or <i>widespread calls at national or international levels for explanation, action or sanction</i>
2	High	Substantial evidence of fear of crime and/or disorder along with evidence of preparations to deal with the consequences – e.g. boarding up of shops. Or <i>members of public representative bodies expressing critical concerns or questioning actions.</i>
3	Moderate (High)	Evidence of widespread alarm at current tension levels. Local media reporting that tension is raised with local opinion formers and/or significant local people stating their fears. Or <i>local and national media may have sustained coverage of the issues.</i>
4	Moderate (Low)	Corroborated evidence that a significant number of people in the community in question or across communities fear crime and/or disorder. They expect crime and disorder to happen if no action is taken to prevent it and/or another event serves to increase tension. Or <i>there is widespread discussion of the issue, some polarisation of views is apparent, media interest is regular and may be at the local and/or national level</i>
5	Above Normal	Some corroborated evidence of fear of crime or disorder within the community. The crime and disorder feared would be of low intensity and/or experienced by a limited range of people. Or <i>there is some evidence of growing levels of discussion, media interest is increasing, may be sporadic but remains at a local level.</i>
6	Normal	<b>Limited community concerns that tension will rise and that, even if it did, the impact will be minor.</b> <b>Or discussion is confined to single interest groups with negligible or no media interest.</b>

### Comment

I have assessed the community feelings on LFR Deployment as 'normal'. There are no notable rises in general community tensions or concerns.

Partners & Stakeholders contacted:

██████████ **Community Safety** (1223hrs 10/02/2020 telephoned ██████████ no issues/concerns raised

██████████ **Safer Neighbourhoods Board**. Also ██████████ **Stop & Search Board** (1245hrs 10/02/2020 telephoned ██████████) No issues/concerns raised. He cannot attend tomorrow but will try and arrange for a representative to be present.

**Lyne Browne MP (West Ham)** contacted by ██████████ who spoke to ██████████. 1240hrs 10/02/2020

**Stephen Timms MP (East Ham)** contacted by ██████████ 1240hrs 10/02/2020. Brief conversation but channel of communication established should Mr Timms need to respond

**Mayor of Newham Rokhsana Fiaz** 1325hrs 10/02/2020 Telephoned by ██████████. Expressed concern RE BME disproportionality however reassured of the technology and application. Requested a debrief telephone call in two weeks' time

**James Beckles Newham Cabinet Council Minister for Crime**

Expressed concerns re data retention and civil liberties, but appeared satisfied with police response. Requested to attend.

**Westfield Plc:** ██████████ **Head of Security**  
No issues or concerns raised (1400hrs 10/02/2020 ██████████)

**Stratford Mall Management:** [REDACTED]  
 (1400hrs 10/02/2020 [REDACTED]) No issues or concerns raised

**II. Evidenced (what does our information tell us is happening)**

**Assessment definitions**

1	Imminent	Tension indicators indicating crime and/or disorder to be expected within hours – e.g. stockpiles of weapons discovered, groups gathering on streets, opposing groups planning to demonstrate. Community and/or criminal intelligence suggests disorder is likely to develop within hours.
2	High	Levels of crime and/or disorder raised along with evidence of serious offences having been committed. Tension indicators showing sustained hostility between particular groups or towards police. There may be evidence of activity by extremists groups. Disorder may have happened in the recent past. Community and/or criminal intelligence suggests disorder or crime likely to develop within days.
3	Moderate (High)	Substantial rise in crime and/or disorder combined with substantial corroborative evidence of other tension indicators. Particular communities may be targeted. Community and/or criminal intelligence suggests disorder or crime is likely to develop unless responses are developed.
4	Moderate (Low)	Crime and/or disorder levels clearly raised above normal. Other tensions indicators –e.g. assaults on police, racist graffiti etc. – providing corroboration. Levels may indicate targeting of specific communities. Levels well above normal. Community and/or criminal intelligence suggests disorder or crime may develop but that steps can be taken to prevent such development.
5	Above Normal	Evidence that crime and/or disorder levels are raised when compared to the normal levels. Raised levels may indicate targeting of particular communities. Levels not substantially above the normal. Information sources do not suggest that crime and/or disorder will develop.
6	Normal	<b>No indication in police crime and disorder reporting that tension is above normal.</b>

**Comment**

I have assessed the community tensions on LFR Deployment, as there are no notable rises in general community tensions or concerns.

No Critical Incidents on BCU, which may affect deployment.

Media interest reviewed: no significant concern 1430hrs 10/02/2020

### III. Potential

#### Assessment definitions

1	Imminent	Local, national or international events, taken alone or in combination, expected to lead to outbreaks of crime and/or disorder within hours. <i>Or reputational damage or other organisational damage will be high and is unlikely to be significantly mitigated by intervention options.</i>
2	High	Local, national or international events, taken alone or in combination, expected to lead to outbreaks of crime and/or disorder within days. <i>Or reputational damage or other organisational impact will be significant and/or sustained intervention options may be of limited value</i>
3	Moderate (High)	Local, national or international events, taken alone or in combination, expected to raise substantially local experienced and evidenced tension. The expected rise in tension may be localised geographically or within communities. <i>Or there will be reputational damage or other organisational impact however this will be limited and can be managed by intervention options</i>
4	Moderate (Low)	Local, national or international events, taken alone or in combination, expected to raise local experienced and evidenced tension. The expected rise in tension may be localised geographically or within communities. <i>Or it is likely that there will be a degree of reputational damage or other organisational impact but this is likely to be minimal</i>
5	Above Normal	Local, national or international events, taken alone or in combination, may lead to limited experienced or evidenced raising of tension. Any expected tension may be localised geographically or within communities. <i>Or there is some apparent danger of reputational damage or other organisational impact</i>
6	Normal	<b>No issues locally, nationally or internationally that would impact on local communities sufficiently to cause abnormal tension levels.</b> <b><i>Or there is no apparent danger of any reputational or other organisational impact</i></b>

#### Comment

I have assessed the potential for escalations in community concerns on LFR Deployment as 'normal' as the 10 MPS LFR trials, which were run from 2016 to Feb' 2019, generated some significant media interest and some activity from civil rights groups, but there were no notable rises in general community tensions or concerns.

#### Identified Risks

The risk of an LFR Deployment resulting in physical exchanges with groups of individuals will need to be assessed on a case-by-case basis. The risk should generally be low or insignificant.

LFR is a politically sensitive topic and there is a risk of political repercussions if a Deployment results in a public perception that LFR is being used inappropriately. There is also the likelihood of damage to the communities trust and confidence in the police. The risk of this occurring should generally be low.

The legal requirements for LFR Deployments are clearly laid out in the relevant MPS documentation (Legal Mandate, Governance document, SOP, Training material, EIA and DPIA). Consequently, the likelihood of any significant breach of the legal requirements should be insignificant. Given the necessary consideration of proportionality for the purposes of legal compliance, this should also ensure all relevant moral issues of considered.

MPS financial investment in LFR is likely to be more than insignificant, so undermining its use would be likely to have financial consequences in that it would reduce the ability of the MPS to use LFR resources optimally.

**Intervention options**

These require case by case assessment for each Deployment and should be addressed by the Authorising Officer (AO).

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1800hrs 10/02/2020 [REDACTED] : NE CU Neighbours & Partnerships :

I have applied for and been granted permission by [REDACTED] to use Live Facial Recognition Technology as an additional tactic with in a Violent Crime Reduction Operation at two locations in Stratford Town Centre on 11<sup>th</sup> February 2020.

My rationale is that NE CU currently has [REDACTED] outstanding suspects, many for violent crime. Despite the best efforts of the MPS to locate and arrest them, they remain outstanding. They are a considerable risk to the public, due to further offences and are evading the criminal justice system, which also comprises confidence/trust in the MPS. I have considered other options and do not believe there is any other comparable tactic.

This evening I have reassessed Experienced / Evidence / Potential factors having spoken to key Stakeholders & Partners. It is fair to say that moderate concerns of disproportionality on BME & Biometric data retention were raised (Mayor Rokhshane Fiaz & James Beckles Cllr Cabinet Member for Crime / Community safety). I believe that these justified concerns were reconciled through conversation when I explained the integrity of the system. A review process has been established, in which feedback from partners is invited.

I will reassess the three factors at 0800hrs 11/02/2020 prior to ground deployment of the operation. At present, I am not aware of any factor which would jeopardise public safety, undermine trust in police, breach Human Rights or civil liberty.

Any lawful protest will be facilitated (policing plan in place)

I have also reassessed the deployment locations. I am satisfied they will not cause disruption to the life of the local community.

Next update 0800hrs 11/02/2020

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